

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WAYNE WELMON, Individually and on Behalf of all  
others similarly situated,

Plaintiff,

vs.

CHICAGO BRIDGE & IRON CO. N.V., GERALD M.  
GLENN, ROBERT B. JORDAN, and RICHARD E.  
GOODRICH,

Defendants.

Case No. 06-CV-01283 (JES)

ELECTRONICALLY FILED

**PLAINTIFFS' NOTICE OF MOTION  
FOR CLASS CERTIFICATION**

**COHEN, MILSTEIN, HAUSFELD &  
TOLL, P.L.L.C.**

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*Co-Lead Counsel For Lead Plaintiffs and Proposed  
Class Representative Walter J. Mundy*

To: All Counsel of Record

PLEASE TAKE NOTICE, that upon the Consolidated Amended Class Action Complaint For Violations of Federal Securities Laws; the accompanying Declaration of Steven J. Toll, dated March 2, 2007 and the exhibits thereto; the accompanying Declaration of Scott P. Hakala, Ph.D. and exhibits thereto; the accompanying Memorandum of Law; and all prior papers and proceedings herein, Lead Plaintiffs, Fortis Investment Management N.A./S.A. and Metzler Investment GmbH, and class member Walter J. Mundy (collectively "Plaintiffs") will move this Court, at the Daniel Patrick Moynihan Courthouse at 500 Pearl Street, New York, New York, on May 23, 2007 at 3:00 p.m., pursuant to Rules 23(a) and 23(b)(3) (collectively "Rule 23") of the Federal Rules of Civil Procedure, for an Order:

- (1) certifying this case as a class action brought on behalf of a class consisting of all persons who purchased and/or otherwise acquired the securities of Chicago Bridge & Iron, N.V. and its subsidiaries and affiliates ("CB&I") during the period March 9, 2005 and February 3, 2006, inclusive (the "Class Period"), and who were damaged thereby. Excluded from the Class are the Defendants; persons who during the Class Period were officers and/or directors of CB&I or of its parent, subsidiaries and/or affiliates; any entity in which the Defendants have or had a controlling interest; the Defendants' liability insurance carriers and any affiliates or subsidiaries thereof; members of the immediate families of any of the foregoing; and their legal representatives, heirs, successors or assigns;
- (2) appointing Plaintiffs as class representatives and their counsel Cohen, Milstein, Hausfeld & Toll, P.L.L.C., Spector, Roseman & Kodroff, P.C., and Milberg, Weiss & Bershad LLP, as co-lead counsel pursuant to Rule 23; and
- (3) granting such other and further relief as the Court deems just and proper.

Dated: New York, New York  
March 2, 2007

Respectfully submitted,

s/ Steven J. Toll

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